

REMARKS**Summary of the Office Action**

Claims 1-3 and 9-10 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Tanaka (JP 62-086756) (hereinafter “Tanaka”) in view of Pan (U.S. Patent No. 6,351,002) (hereinafter “Pan”).

Claim 4 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Tanaka and Pan and further in view of Mizuno (U.S. Patent No. 6,384,396) (hereinafter “Mizuno”).

Claims 5-8 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Mizuno in view of Tanaka and further in view Pan.

Claim 11 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Tanaka, Pan, and further in view of Tashiro (U.S. Patent Application Publication No. 2002/0017611) (hereinafter “Tashiro”).

Summary of the Response to the Office Action

Applicants have cancelled claims 4 and 8-10, amended claims 1, 5, and 11, and added new claims 12-17 to differently describe embodiments of the disclosure of the instant application. Accordingly, claims 1-3, 5-7 and 11-17 are currently pending for consideration.

Rejection under 35 U.S.C. § 103(a)

Claims 1-3 and 9-10 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Tanaka in view of Pan. Claim 4 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Tanaka and Pan and further in view of Mizuno. Claims 5-8 stand rejected under 35 U.S.C.

§ 103(a) as being unpatentable over Mizuno in view of Tanaka and further in view Pan. Claim 11 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Tanaka, Pan, and further in view of Tashiro. Applicants have cancelled claims 4 and 8-10 and amended claims 1, 5, and 11 to differently describe embodiments of the disclosure of the instant application. To the extent that these rejections might be deemed to still apply to the claims as newly-amended, they are respectfully traversed for at least the following reasons.

Applicants respectfully submit that Tanaka, Pan, and Mizuno do not disclose the features of the wires or the second wires being located above the electroconductive member so as to overlap the electroconductive member when viewed from a direction of incidence of light. These features are based on the description in paragraphs [0055] and [0060] of the specification of the instant application. As a result, Applicants respectfully submit that newly-amended independent claim 1 of the instant application is not obvious in view of Tanaka and Pan and newly-amended independent claim 5 of the instant application is not obvious in view of Tanaka, Pan, and Mizuno.

Applicants respectfully submit that newly-presented claims 12 and 14 are based on the description in paragraphs [0055] and [0056] of the specification of the instant application. Tanaka, Pan, and Mizuno do not disclose the features of the signal lines or the first wires being located above the second wires so as to place an insulating layer therebetween.

Applicants respectfully submit that newly-presented claims 13 and 15 are based on the description in paragraph [0056] of the specification of the instant application. Tanaka, Pan, and Mizuno do not disclose the features of the signal lines or the first wires being located above the second conductivity type semiconductor regions so as to be apart from portions between the

second conductivity type semiconductor regions adjacent to each other and intersecting with the second conductivity type semiconductor regions when viewed from the direction of incidence of light.

Applicants respectfully submit that Tashiro does not disclose the features of the scintillator being in contact with a light incident surface of the solid-state imaging apparatus. These features are based on the description at paragraph [0044] of the instant application's specification. As a result, Applicants respectfully submit that newly-amended claim 11 and newly-presented claims 16 and 17 are not obvious from Tanaka, Pan, and Tashiro.

Accordingly, Applicants respectfully assert that the rejections under 35 U.S.C. § 103(a) should be withdrawn because the applied art of record, whether taken separately or in combination with each other, does not teach or suggest each feature of independent claims 1 or 5, as amended. As pointed out in MPEP § 2131, "[t]o anticipate a claim, the reference must teach every element of the claim." Thus, "[a] claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. Verdegaal Bros. v. Union Oil Co. Of California, 2 USPQ 2d 1051, 1053 (Fed. Cir. 1987)." Furthermore, Applicants respectfully assert that the dependent claims are allowable at least because of their dependence from independent claims 1 or 5, as amended, and the reasons set forth above. In addition, Applicants respectfully submit that newly-presented independent claim 17 is allowable at least for the reasons discussed previously.

CONCLUSION

In view of the foregoing, Applicants submit that the pending claims are in condition for allowance, and respectfully request the timely allowance of the pending claims. Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact Applicants' undersigned representative to expedite prosecution. A favorable action is awaited.

EXCEPT for issue fees payable under 37 C.F.R. § 1.18, the Commissioner is hereby authorized by this paper to charge any additional fees during the entire pendency of this application including fees due under 37 C.F.R. § 1.16 and 1.17 which may be required, including any required extension of time fees, or credit any overpayment to Deposit Account No. 50-0573. This paragraph is intended to be a **CONSTRUCTIVE PETITION FOR EXTENSION OF TIME** in accordance with 37 C.F.R. § 1.136(a)(3).

Respectfully submitted,

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